

## THE KASEN AND LIU LAW FIRM, PLLC

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BY CM/ECF

June 26, 2025

The Honorable Edgardo Ramos United States District Court For the Southern District of New York 40 Foley Square New York, New York 10007

Re: Dongguan Cheng One Co., Ltd. v. Desen Inc.; 1:24-cv-03388

Dear Honorable Sir:

Counsel for both sides conferred, but were not able to agree on the language to be incorporated in a joint status letter. Plaintiff's attorney has submitted her own letter, and this letter is in response.

This matter was last before the Court on June 5, 2025, when oral argument was had with respect to defendant's motion to vacate the judgment. At the close of oral argument, it was agreed that the Court would hold the motion in abeyance until June 26, 2025, to allow the parties to engage in settlement discussions.

Settlement has not been reached. It is true that defendant did not return the completed information subpoena requested by plaintiff's counsel as a condition of settlement. It does not appear that an extension of time to pursue negotiations would be productive. The principal of Desen Inc. has closed communications with my office.

Accordingly, it is respectfully requested that the Court rule on the motion.

I thank Your Honor for his kind attention to this matter.

Respectfully submitted,

Aleksander B. Milch, Esq.

AM/jy